REMARKS/ARGUMENTS

Claims 1-9 of the present application are currently pending. Claim 1 has been amended and no new matter has been added. The amendment to claim 1 does not result in a narrowing of the claim limitation.

In the Office Action mailed April 8, 2004, claims 1-5 and 7-9 stand rejected under 35 U.S.C. 103(a) as being unpatentable over United States Pat. No. 6,249,913, issued to Galipeau et at. (hereinafter Galipeau) in view of United States Pat. No. 5,561,769, issued to Kumar et al. (hereinafter Kumar).   In addition, claim 6 of the present application stands rejected under 35 U.S.C. 103(a) as being unpatentable over Galipeau in view of Kumar and United States Apt. No. 6,512,921, issued to Hadinger. (hereinafter Hadinger). For the reason set forth below, the Applicants traverse the rejections and respectfully submit that the claims of the present application are patentable over Galipeau, Kumar, and Hadinger.

To establish a prima facie case of obviousness, three basic criteria must be met by the examiner. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine the teaching of the references. Second, there must be a reasonable expectation of success. Finally, the prior art reference or references, when combined, must teach or suggest all the claims limitations. (see MPEP 2143.03)

Claim 1 of the present application is directed to a multimedia communication network for a passenger vehicle and includes a plurality of display devices each having at least a control processor, a local memory storage, and a display, and a local area network including a wiring harness interconnecting the plurality of display devices. The plurality of display devices are configured to include a server device portion and a client portion. As such, each of the plurality of display devices cooperate over the local area network so as to define a distributed server local area network architecture.

Galipeau is directed to an aircraft data management system and recites a plurality of data sources, at least one power source, an integrated seat box disposed

proximate to a group of identifiable seats and configured to covert at least one of said data and power to a form useful to a passenger occupying one of the identifiable seats, a data network interface module coupled to the integrated seat box and being configured to be fault tolerant, a network controller capable of managing the plurality of data sources, and a seat-to-seat cable having data communication lines and a power supply line therein wherein data and power are routed by the network controller to selected ones of the seats. Unlike the distributed local area network architecture recited in claim 1 of the present application, Galipeau requires a network front end and integrated seat boxes to distribute data throughout the passenger conveyance. As such, Galipeau utilizes a conventional data distribution architecture to distribute information. Therefore the Applicants respectfully submit that Galipeau fails to teach all of the claim limitations of claim 1 in accordance with MPEP 2143.

Further, the Applicants respectfully submit that Fig. 3 of Galipeau clearly illustrates that, unlike the system recited in claim 1 of the present application wherein individual displays communicate directly with the wiring harness forming the local area network, the system disclosed in Galipeau teaches a "daisy-chain" configuration wherein power and data is transmitted from the head end 72 down to a forward integrated seat box 18 and then sequentially down the length of the seat column through ISB 18' and 18". As such, the Applicants respectfully submit that Galipeau teaches away from the device recited in claim 1 of the present application.

Kumar is directed to a method and apparatus for executing a distributed algorithm or service on a simple network management protocol based computer network and includes configuring each of the nodes of a network as a manager node at one interval and as an agent at another interval in the network to act as peers, wherein when a first node acts as a manager node the first manager sends a "Get" message to another node acting as an agent to read the agent node's MIB and the manager node sends a "Set" message to the agent node's Mib, when the first node acts as an agent node the first agent node sends a "GetResponse" message to another manager node and the first agent node sends a "Trap" message to manager node in response to an event, and incorporating an algorithm within the SNMPv1. The Applicants respectfully

submit that Fig. 4 of Kumar clearly illustrates that, unlike the system recited in claim 1 of the present application, wherein individual display communicate directly with the wiring harness forming the local area network, the system disclosed in Kumar teaches a manager-agent configuration wherein data is sequentially transmitted down the length of the communication link between individual nodes.

Further, the Applicants respectfully submit that the Examiner has failed to provide any motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine Galipeau and Kumar. Galipeau is directed to an aircraft data management system while Kumar is directed to distributing information over a management protocol based computer network. Kumar never teaches or suggest the use of the Kumar system in any passenger conveyance. Moreover, the Applicants respectfully submit that the distributed network architecture of Kumar teaches away from the conventional server architecture disclosed in Galipeau. Thus, the Applicants respectfully submit that the Examiner has used impermissible hindsight to re-create the Applicants' invention.

In summary, the Applicants respectfully submit that Galipeau and Kumar, either alone or in combination, fail to teach or suggest all the limitations of claim 1 in accordance with MPEP 2143. Further, the Applicants respectfully submit that there is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine the teaching of the references. For at least the reasons stated above, the Applicants submit that claim 1 of the present application is patentable over Galipeau in view of Kumar. Further, the Applicants submit that claims 2-4, which variously depend on claim 1, are likewise patentable over the cited prior art references. Moreover, as claims 5 and 7-9 of the present application recite similar limitations and are directed to a distributed server architecture for passenger conveyances, the Applicants respectfully submit that claims 5 and 7-9 are likewise patentable over Galipeau and Kumar for at least the reasons stated above.

Claim 6 of the present application, which is dependent on claim 5, stands rejected as being unpatentable over Galipeau in view of Kumar and Hadinger. Claim 6

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is directed to a modular multi media communication network for a passenger vehicle. As stated above, the Applicants respectfully submit that Galipeau and Kumar, either alone or in combination, fail to teach or suggest all the limitations of claim 5 of the present application. Moreover, the Applicants respectfully submit that there is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine the teaching of Galipeau and Kumar.

Hadinger is directed to satellite multimedia delivery to vehicles and includes a first antenna configured to receive first carrier signals carrying first data from a broadband geostationary satellite, a first demodulator connected to the first antenna to demodulate the first carrier signal and generate first data signals, a second antenna configured to receive second carrier signals carrying second data from a narrowband satellite, a second demodulator to demodulate the second carrier signal to generate second data signals, a third source of data signals carrying third data signals, a modulator responsive to the third data signals for generating a third carrier signal carrying the third data for transmission by the second antenna, a first utilization system configured to utilize the first data, a second utilization system configured to utilize the second data, and a router to route the first and second data signals. As such, the Applicants respectfully submit that, like Galipeau and Kumar, Hadinger fails to teach or suggest all the limitations of claim 6. Moreover, the Applicants respectfully submit that Hadinger fails to contemplate a distributed server architecture as recited in claim 6 of the present application.

For at least the reasons stated above, the Applicants respectfully submit that claim 6 of the present application is patentable over Galipeau in view of Kumar and Hadinger.
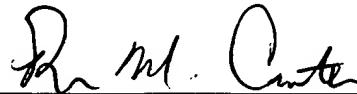
Should direct communication with the Applicants' attorney serve to advance the prosecution of the case, the Examiner is invited to contact Bruce Canter at the number listed below.

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Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

The Commissioner is authorized to charge any fee which may be required in connection with this Amendment to deposit account No. 50-1329.

Respectfully submitted,

Dated: 10|8|04

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